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13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **SAN FRANCISCO DIVISION**

16 U.S. EQUAL EMPLOYMENT
17 OPPORTUNITY COMMISSION,

18 Plaintiff,

19 v.

20 TESLA, INC.,

21 Defendant.

Case No. 3:23-cv-4984-JSC

**DECLARATION OF THOMAS E. HILL
IN SUPPORT OF UNOPPOSED MOTION
TO WITHDRAW AS COUNSEL OF
RECORD FOR DEFENDANT TESLA,
INC.**

[Civ. L.R. 11-5]

Hearing Date: September 26, 2024
Time: 10:00 AM
Judge: Hon. Jacqueline S. Corley
Courtroom: 8

Complaint Filed: September 28, 2023

*[Notice of Motion and Motion; Memorandum
of Points and Authorities in Support; and
Proposed Order filed concurrently herewith]*

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DECLARATION OF THOMAS E. HILL

I, Thomas E. Hill, say and declare:

1. I am an attorney at law licensed to practice as a member of the State Bar of California (CA Bar No. 100861), and I am admitted to appear before all of the United States District Courts in California. I am a partner with Holland & Knight LLP and among the current counsel of record for Tesla, Inc. (“Tesla”) in the above-captioned action.

2. I make this declaration in support of the Motion to Withdraw as Counsel of Record filed in this action on behalf of myself, Samuel J. Stone, Paul W. Matthias-Bennetch, and Holland & Knight LLP. I have personal knowledge of the facts set forth herein, and, if called upon to do so, I could testify competently thereto.

3. Tesla’s counsel of record in this matter have included Holland & Knight LLP, myself, Messrs. Stone and Matthias-Bennetch (together, “Withdrawing Counsel”), Sara A. Begley, Christina T. Tellado and Mary T. Vu (all formerly with Holland & Knight, and, as of August 5, 2024, all now with Polsinelli LLP; together, “Polsinelli Counsel”), and Raymond A. Cardozo and Tyree P. Jones, Jr. of Reed Smith LLP; together, “Reed Smith Counsel”).

4. On August 9, 2024, Polsinelli Counsel filed appearances on behalf of themselves and Polsinelli LLP as counsel for Tesla in this action. (ECF No. 60)

5. On August 9, 2024, I provided written notice to Tesla and to counsel of record for the U.S. Equal Employment Opportunity Commission (“EEOC”) of Withdrawing Counsel’s intent to withdraw as counsel of record for Tesla. This notice was given in compliance with Rule 11-5 of the Local Rules of the United States District Court for the Northern District of California.

6. Tesla consents to the withdrawal of Withdrawing Counsel and Plaintiff EEOC has expressed no opposition to the withdrawal. Despite this withdrawal, substantial continuity will exist in Tesla’s counsel of record given the recent appearances of Polsinelli Counsel and the ongoing representation of Reed Smith Counsel.

Executed on this 12th of August, 2024, at Los Angeles, California.

By: /s/ Thomas E. Hill

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